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January 26, 2018

VIA ECF

The Honorable Gregory H. Woods
U.S.D.C., Southern District of New York
500 Pearl Street, Room 2260
New York, New York 10007

Re: *Royal Park Invs. SA/NV v. The Bank of New York Mellon*, No. 14-cv-6502 (GHW)

Dear Judge Woods:

We write jointly on behalf of plaintiff Royal Park Investments SA/NV (“Royal Park”) and defendant The Bank of New York Mellon (“BNYM”). The parties have met and conferred and mutually request the Court approve a brief extension to certain party fact discovery completion dates.

On September 7, 2017, the Court entered the Scheduling Order, which provides in part that party fact depositions are to be completed by February 2, 2018. The parties respectfully submit that good cause exists to briefly extend the deadline within which party fact depositions are to be completed until February 28, 2018. The parties have thus far completed the vast majority of the depositions to be taken in this case, for a total of 16 that will be completed by the current deadline of February 2. However, the parties have had to reschedule certain witness depositions due to illness and unforeseen scheduling conflicts. In addition, for the convenience of the witnesses, the parties have agreed to take certain depositions in Europe, and these depositions required additional time to coordinate. This modest extension will not affect any other deadline in the case, other than the dates for service of Interrogatories and Requests for Admission, which were keyed off of the close of party fact depositions to allow the parties sufficient time to incorporate information learned during depositions. Accordingly, the parties propose that those deadlines also be extended so that they remain at two weeks following the close of party fact depositions – March 14, 2018.

Second, the September 7, 2017 Scheduling Order in this action provides that the parties are to meet and confer regarding the remainder of the case schedule following party fact discovery “within the earlier of 14 days after any decision on class certification or February 2, 2018.” The parties are in the process of meeting and conferring regarding the remainder of the schedule in this action, including the completion of third-party discovery and expert discovery, and intend to submit a proposed revised schedule by February 2.

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The parties respectfully submit that good cause exists to briefly extend the deadline within which party fact depositions are to be completed until February 28, 2018, with a corresponding brief extension of the date for service of Interrogatories and Requests for Admission, and that this is a reasonable schedule in light of the nature and complexity of the action and the number of depositions to coordinate and schedule.

Respectfully submitted,

/s/ Christopher M. Wood
Christopher M. Wood
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/s/ Jennifer M. Rosa
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cc: All Counsel (via ECF)